

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	X	
ROYAL PARK INVESTMENTS SA/NV,	:	Civil Action No. 1:14-cv-04394-AJN-BCM
Individually and on Behalf of All Others	:	
Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	PLAINTIFF ROYAL PARK INVESTMENTS
	:	SA/NV’S NOTICE OF MOTION AND
vs.	:	MOTION REGARDING SAMPLING-
	:	RELATED EXPERT DISCOVERY
DEUTSCHE BANK NATIONAL TRUST	:	
COMPANY, as Trustee,	:	
	:	
Defendant.	:	
	:	
	X	

PLEASE TAKE NOTICE that, pursuant to the Court's August 25, 2017 Order, plaintiff Royal Park Investments SA/NV ("Royal Park") hereby moves the Court for an order allowing the parties to conduct sampling-related expert discovery. This motion is supported by the memorandum of law and the Declaration of Lucas F. Olts and exhibits thereto, concurrently filed herewith, all pleadings and papers filed herein, arguments of counsel and any other matters properly before the Court. Oral argument is requested.

DATED: September 8, 2017

ROBBINS GELLER RUDMAN
& DOWD LLP
ARTHUR C. LEAHY
STEVEN W. PEPICH
LUCAS F. OLTS
DARRYL J. ALVARADO

s/LUCAS F. OLTS
LUCAS F. OLTS

655 West Broadway, Suite 1900
San Diego, CA 92101-8498
Telephone: 619/231-1058
619/231-7423 (fax)
artl@rgrdlaw.com
stevep@rgrdlaw.com
lolts@rgrdlaw.com
dalvarado@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
CHRISTOPHER M. WOOD
414 Union Street, Suite 900
Nashville, TN 37219
Telephone: 615/244-2203
615/252-3798 (fax)
cwood@rgrdlaw.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2017, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 8, 2017.

s/ LUCAS F. OLTS

LUCAS F. OLTS

ROBBINS GELLER RUDMAN
& DOWD LLP

655 West Broadway, Suite 1900

San Diego, CA 92101-8498

Telephone: 619/231-1058

619/231-7423 (fax)

E-mail: lolts@rgrdlaw.com